

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:	*	
	*	Case No. 17-10778
MELISSA CAMPOS-POENHERT	*	
	*	Chapter 7
Debtor	*	

MELISSA CAMPOS-POENHERT	*	
	*	Adv. Pro. No. 17-01130-BFK
Plaintiff	*	
	*	
v.	*	
	*	
WELLS FARGO BANK, N.A.	*	
	*	
Defendant	*	

JOINT MOTION TO EXTEND DEADLINES

COME NOW Plaintiff Melissa Campos-Poenhert and Defendant Wells Fargo Bank, N.A., by and through their respective attorneys, and hereby respectfully request that this Court issue an Order extending the discovery and summary judgment deadlines in this matter by approximately 30 days. The requested extension will not affect any of the other dates set in the case. In support they would present the following:

1) On or about December 14, 2017, the Court issued the summons in this adversary proceeding.

2) The Scheduling Order was entered that same date, setting the discovery deadline at 120 days from the issuance of the summons, on or about April 13, 2018, and setting the deadline for motions for summary judgment for fourteen days thereafter, *i.e.*, April 27, 2018.

3) The final pretrial conference is set for June 4, 2018 at 9:30am.

4) The parties are currently arranging for depositions, but Plaintiff's counsel does not have available dates until after the April 13, 2018 date.

5) Accordingly, the parties are requesting an extension to the existing discovery deadline until May 14, 2018, and a corresponding extension of the deadline for motions for summary judgment until May 29, 2018.¹

6) The requested extension would not impact the June 4, 2018 final pretrial conference.

WHEREFORE, the Parties respectfully move this Court to issue an Order extending the discovery deadline to May 14, 2018, and the motions for summary judgment deadline to May 29, 2018.

Respectfully submitted this 27th day of March, 2018,

/s/ Jeremy C. Huang

Jeremy C. Huang, VSB #76861
WOEHRLE DAHLBERG JONES YAO PLLC
10615 Judicial Dr., Suite 102
Fairfax, VA 22030
(T) 703-755-0214 | (F) 571-285-0065
jhuang@lawfirmvirginia.com

SEEN AND AGREED:

/s/ Lela M. Ames

Lela M. Ames, VSB #75932
Womble Bond Dickinson (US) LLP
1200 Nineteenth Street, N.W. Suite 500
Washington, DC 20036
(T) 202-857-4427 | (F) 202-261-0088
lela.ames@wbd-us.com

¹ May 28, 2018, is Memorial Day. Accordingly, the parties respectfully request that the deadline for motions for summary judgment be set for the following business day.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of March, 2018, a copy of the foregoing Motion was served first class mail, postage prepaid, and or via the Court's Electronic Filing System upon the following persons:

Lela M. Ames
Womble Bond Dickinson (US) LLP
1200 Nineteenth Street, N.W. Suite 500
Washington, DC 20036
Attorney for the Defendant

/s/ Jeremy C. Huang